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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,  
Plaintiff,  
vs.

Case. No.: 2:19-cv-00652-JAD-DJA

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; JOSEPH LOMBARDO,  
individually and in his official capacity as  
Sheriff; JOHN L. PELLETIER, an  
individual; RICHARD E. MAUPIN, an  
individual; RYAN J. FRYMAN, an  
individual; JUAN D. CONTRERAS, an  
individual; ALLEN J. PAVESE, an  
individual; BRANDON M. MEADS, an  
individual; DOES I – V, individuals,  
Defendants.

**STIPULATION AND ORDER TO**  
**EXTEND DISPOSITIVE MOTION**  
**DEADLINES**

ECF No. 114

Pursuant to LR IA 6-1, Plaintiff NEBYOU SOLOMON, and Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT, JOSEPH LOMBARDO, JOHN L. PELLETIER, RICHARD E. MAUPIN, RYAN J. FRYMAN, JUAN D. CONTRERAS, ALLEN J. PAVESE, and BRANDON M. MEADS (collectively “Parties”) by and through their respective counsel, submit this Stipulation and Order to Extend Dispositive Motion Deadline. The parties respectfully request the dispositive motion deadline be extended by four (4) weeks.

Currently the dispositive motion deadline is September 20, 2021. (ECF No. 113). The parties respectfully request the dispositive motion deadline be extended until October

1 18, 2021. Similarly, the parties hereby request that the last day to file a Joint Pretrial Order  
2 shall be extended for four (4) weeks or until November 22, 2021. In the event dispositive  
3 motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty  
4 (30) days after decision on the dispositive motions or upon further Order by the Court  
5 extending the time period in which to file the Joint Pretrial Order.

6 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the  
7 requested extension. Due to extenuating circumstances, including several court-ordered  
8 deadlines, and attorney Alina M. Shell leaving the law firm of McLetchie Law, Plaintiff's  
9 counsel respectfully requested a three -week extension, and Defendants' counsel agreed, but  
10 requested it be four weeks due to his unavailability from October 4, 2021 until October 9,  
11 2021.

12 Further, the parties believe that dispositive motions may resolve related in the case,  
13 such as the same will not be required to proceed to a jury and will conserve judicial resources.

14 This extension request is made in good faith, jointly by the parties, and not for the  
15 purposes of delay. Trial in this matter has not yet been set. Moreover, since this request is a  
16 joint request, neither party will be prejudiced.

17 This Request for an extension of time is not sought for any improper purpose or  
18 other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing  
19 sufficient time to prepare dispositive motions in this case and adequately prepare their  
20 respective cases for trial to the extent the dispositive motions do not resolve all of the claims.

21 This is the first request for extension of the dispositive motion deadline in this  
22 matter. The parties respectfully submit that the reasons set forth above constitute compelling  
23 reasons for the extension.

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WHEREFORE, the parties respectfully request that this Court extend the deadline to file dispositive motions in the above-captioned case four (4) weeks, up to and including October 18, 2021.

**IT IS SO STIPULATED.**

DATED this 16<sup>th</sup> day of September, 2021.      DATED this 16<sup>th</sup> day of September, 2021.

**MCLETCHIE LAW**

**MARQUIS AURBACH COFFING**

/s/ Margaret A. McLetchie


/s/ Nicholas D. Crosby

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Lombardo; John L. Pelletier; Richard E.  
Maupin; Ryan J. Fryman; Juan D.  
Contreras; Allen J. Pavese; and Brandon  
M. Meads*

**ORDER**

**IT IS SO ORDERED.**

  
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U.S. District Judge Jennifer A. Dorsey  
Dated: September 17, 2021